

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 2:22-cv-1712

\$5,206.00 IN UNITED STATES
CURRENCY,

Defendant.

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney for the Western District of Pennsylvania, and respectfully represents as follows:

1. This is a civil action *in rem* for forfeiture to the United States of \$5,206.00 in United States currency (the “Defendant Currency”) pursuant to 21 U.S.C. § 881(a)(6).
2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355(a). Venue is proper under 28 U.S.C. §§ 1395 and 1355(b).
3. On June 17, 2022, Bureau of Alcohol, Tobacco, Firearms and Explosives agents (“ATF”) executed a Federal Search Warrant for the residence known and numbered as 5007 Blair Street, Pittsburgh, PA 15207 (the “Residence”).
4. During the execution of the federal search warrant, Melvin Bowles (“Bowles”) and his girlfriend, Precious Bey-Lewis (“Bey-Lewis”), were present.

5. Bowles was arrested at the Residence and transported to the ATF Pittsburgh office.

6. During the search of the Residence, investigators recovered several firearms, electronic equipment, narcotics, marijuana, miscellaneous drug paraphernalia, and the Defendant Currency.

7. In the living room of the Residence, ATF recovered two bundles of suspected heroin, one marked "007," and one marked "Turbo." ATF also recovered approximately (8) eight bricks of suspected heroin from the kitchen. Underneath an ottoman, within arm's length of the living room couch, ATF recovered an Intratec, Tec-22 pistol, bearing serial number 071797 with one loaded magazine and with one round in the chamber. Also, in the living room, ATF recovered (3) iPhones, (2) Glock boxes, a digital scale and marijuana.

8. ATF found \$346.00 of the total Defendant Currency in the pocket of a pair of men's jeans located in the living room.

9. In the master bedroom of the Residence, ATF recovered \$345.00 of the total Defendant Currency in the top-drawer of Bowles' nightstand, on the right-side of the bed. ATF also recovered more than \$2,000.00 of the Defendant Currency on a shelf under the television in the master bedroom. Within the master bedroom, ATF also recovered (2) cell phones, one Glock bag containing (2) unloaded Glock magazines.

10. During the search of Bey-Lewis' Hyundai, investigators located two Glock pistols with magazines, ammunition, DT-M3 Tactical LED/Laser, and a holster.

11. At the Residence, ATF conducted an interview of Bey-Lewis during the execution of the Federal Search Warrant.

12. During the interview with Bey-Lewis, ATF observed an individual fleeing from the basement door at the front of the Residence. ATF was not able to apprehend the individual, but Bey-Lewis advised ATF that the individual who fled was Davondre Bruce ("Bruce").

13. Bey-Lewis acknowledged that Bruce was "on the run" and had been staying at the Residence and sleeping on the living room couch for the past two weeks. ATF presented a Pennsylvania state identification photograph of Bruce to Bey-Lewis. She confirmed that the photo was of Bruce.

14. Bruce had two active state Arrest Warrants. One for Dangerous Drugs originating from North Buffalo Police Department, Kittanning, PA and the other for Flight to Avoid, originating from Pennsylvania State Police, Butler, PA.

15. She acknowledged that she had contacted Bruce on his cell phone as recently as June 16, 2022. ATF confirmed that Bruce's cellular device was active on June 22, 2022.

16. After the interview with Bey-Lewis, ATF conducted detailed investigation and surveillance of Bruce, and on June 24, 2022, ATF took Bruce into custody.

17. During the interview with ATF, Bey-Lewis indicated that she has been residing at the Residence since April 2021. She acknowledged that her boyfriend, Bowles, has a medical marijuana card, but she does not have one since she owns a firearm.

18. Based on the above circumstances, investigators determined that the Defendant Currency was intended to be furnished in exchange for a controlled substance and/or represented proceeds of unlawful drug transactions.

19. The Defendant Currency was seized by investigators pursuant to 21 U.S.C. § 881(a)(6).

20. After the seizure, the ATF instituted administrative forfeiture proceedings against the Defendant Currency. Bey-Lewis filed a claim to the Defendant Currency as part of the

administrative proceedings. As a result, the United States has instituted this civil forfeiture action against the Defendant Currency.

21. Based on the foregoing, the Defendant Currency is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6) since it constitutes moneys furnished or intended to be furnished in exchange for a controlled substance and/or proceeds traceable to such an exchange and/or moneys used or intended to be used to facilitate any such violation of the Controlled Substances Act.

WHEREFORE, the United States of America respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Currency; that Judgment of Forfeiture be entered in favor of the United States for the Defendant Currency; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

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United States Attorney

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VERIFICATION

I am a Special Agent of the Bureau of Alcohol, Tobacco, Firearms and Explosives and the officer assigned the responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct. Executed on this 01 day of December, 2022.



Robert A. McGlennon, Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives